January 18, 2017

RE: Calling on the World Bank to End the Enabling the Business of Agriculture (EBA)

Dear Dr. Jim Yong Kim,

We are writing today to urge you to put an end to the Enabling the Business of Agriculture (EBA) project, which jeopardizes farmers’ right to seeds, food security, and the future of our planet.

In 2012, the World Bank was tasked by the G8 to create a “Doing Business in Agriculture Index.”\(^1\) With the support of the US, UK, Danish, and Dutch governments as well as the Bill and Melinda Gates Foundation, the Bank launched the EBA project, which will benchmark the agricultural policies of over 60 countries in 2017.

The EBA’s top-down approach dictates the so-called “good practices” to regulate agriculture and scores countries on how well they apply and implement its prescriptions. Based on the EBA scores, the World Bank leverages policy changes in agriculture.\(^2\) This is a dangerously misguided effort, as national policymaking should prioritize locally adapted solutions based on the experiences and demands of farmers, pastoralists, fisherfolks, and rural communities.

Among several categories of indicators (Finance, Transport, Fertilizer, etc.), the EBA includes a sub-indicator which evaluates seed regulations.

In developing countries, farmers source **80 to 90 percent of their seeds within farmer-managed seed systems.** These systems are maintained by farmers’ own work to recycle and save seeds from their crops, and by farmer-to-farmer gifts, exchanges, and trade. Farmer-managed seed systems provide a rich diversity of seed, including varieties that are affordable and adapted to local environmental conditions. They are vital to support agro-biodiversity, food security, and resilience against climate and economic shocks.

Yet the EBA’s narrow set of “good practices” to regulate seeds systems restricts policymaking to facilitating private development and marketing of industrial seeds. The EBA uses misleading language by calling industrial seeds “quality seeds”\(^3\) and conveys the perception that farmers’ seeds are unworthy of policy support. The project pushes governments to adopt intellectual property rights framework, which curtails farmers’ rights to save, exchange, and sell seeds. It advocates for reforms to accelerate and minimize the costs of releasing industrial seeds; and places corporations at the center of every aspect of seed systems.

While the EBA reforms will not benefit the majority of farmers, they will increase the profits of a handful of private companies. Only six multinationals currently control over two-thirds of the industrial seed market, and pending agroindustry mergers stand to further consolidate this oligopoly.\(^4\) The concentration of the global seed market has a significant impact on seed prices\(^5\) as well as seed diversity. Replacing farmers’ seeds with a few uniform industrial varieties contributes to the rapid erosion of global agro-biodiversity, which is crucial to address the climate crisis.

**In order to protect farmers, food security, and our planet, we urge you to put an immediate end to the EBA project. We call on the World Bank to rather fight poverty and food insecurity by promoting vibrant local seed systems, and supporting true participation of farmers in the design of regulations and policies in the agricultural sector.**
We appreciate you addressing this critical issue and look forward to hearing from you at your earliest convenience.

Sincerely,

1. Abibiman Foundation
   Ghana
2. Acción Ecológica
   Ecuador
3. Action Ceinture Verte pour l'environnement (ACVE)
   Burundi
4. Action for Solidarity Environment Equality and Diversity (ASEED)
   Netherlands
5. African Center for Biodiversity
   South Africa
6. Agrarian Trust
   USA
7. Alianza Hondureña frente al Cambio Climático (AHCC)
   Honduras
8. Alliance for Sustainable and Holistic Agriculture (ASHA)
   India
9. Amis de l'Afrique Francophone (AMAF - Benin)
   Benin
10. Anywaa Survival Organisation
    UK/Ethiopia
11. Asia Pacific Forum on Women Law and Development (APWLD)
    Asia
12. Asociación Nacional de Fomento a la Agricultura Ecológica (ANAFAE)
    Honduras
13. Asociacion Red de Coordinación en Biodiversidad
    Costa Rica
14. Association des Jeunes Agriculteurs de Casamance (AJAC LUKAAL)
    Senegal
15. Association des Organisations Professionnelles Paysannes de Kayes (AOPP)
    Mali
16. Association for Plant Breeding for the Benefit of Society (APBREBES)
    International
17. Association pour la Défense des Droits de l’Eau et de l’Assainissement (ADDEA)
    Senegal
18. Association Recherche Action pour la Nature (ARAN)
    Togo
19. Banana Link
    UK
20. Bangladesh Fish Workers Alliance
    Bangladesh
21. Biofuelwatch
    USA/UK
22. Bioscience Resource Project
    USA
23. Biowatch South Africa
    South Africa
24. Both ENDS
    Netherlands
25. Bread for All
    Switzerland
26. Bretton Woods Project
    UK
27. Broadley Garden Centre
    UK
28. Broederslijk Delen
    Belgium
29. Cadre de Concertation des Producteurs d’Arachide (CCPA)
    Senegal
30. CARITAS Kaolack
    Senegal
31. CCFD-Terre Solidaire
    France
32. Center for Sustainable Development (CENESTA)
    Iran
33. Centre de Recherche sur l’Environnement, la Démocratie et les Droits de l’Homme
    DRC
34. Centro de Iniciativas en Políticas Ambientales
    Nicaragua
35. Centro de los Derechos del Campesino
    Nicaragua
36. CEPA-SL
    Sierra Leone
37. Cercle pour la Défense de l’Environnement (CEDEN)
    RDC
38. Citizen Consumer and Civic Action Group (CAG)
    India
39. CNCD-11.11.11
    Belgium
40. Coalición Nacional de Redes y Organizaciones Ambientales (CONROA)
    Honduras
41. Coalition pour la Protection du Patrimoine Génétique Africain (COPAGEN)
    Senegal
42. Collectif Citoyen pour l’Agro-Ecologie (CCAE)
    Burkina Faso
43. Community Alliance for Global Justice/AGRA Watch
    USA
44. Construisons Ensemble le Monde (CEM)
    DRC
45. Coordinador Civil de Masaya
   Nicaragua
46. Coordinadora Civil
   Nicaragua
47. Earthlife Africa
   South Africa
48. EarthLore Foundation
   South Africa
49. Eastern Africa Smallholder Farmers Association (EASFA)
   East Africa
50. EcoNexus
   UK
51. Education For Better Living Organization (EBLI)
   Tanzania
52. Enda Pronat
   Senegal
53. Environmental Justice Initiative for Haiti
   USA
54. ETC Group
   Canada
55. Fahamu Africa
   Senegal
56. Farmworker Association of Florida
   USA
57. Fastenopfer (Swiss Catholic Lenten Fund)
   Switzerland
58. Fondama
   Haiti
59. Food Sovereignty Ghana
   Ghana
60. Foro Ambiental Santiagueño
   Argentina
61. Foundation Karibu
   Tanzania
62. Friends of the Siberian Forests
   Russia
63. Gaia Foundation
   UK
64. Gender Action
   International
65. Global Justice
   UK
66. GMB
   UK
67. GRAIN
   International
68. Greenhorns
   USA
69. Groundswell International
   International
70. HATOF Foundation
   Ghana
71. ICCA Consortium
   International
72. Indigenous Peoples Forum
   India
73. Indigenous Perspectives
   India
74. Initiatives d’Echanges pour un Développement Durable (IEDD)
   Burkina Faso
75. CICODEV Afrique
   Senegal
76. Institute for Agriculture and Trade Policy (IATP)
   USA
77. International Accountability Project
   International
78. Inyanda Land Rights Movement
   South Africa
79. Iowa CCI
   USA
80. JINUKUN
   Benin
81. JM&Co
   UK
82. Kalpavriksh
   India
83. Kasisi Agricultural Training Centre
   Zambia
84. La Route du Sel et de l’Espoir
   France
85. Labour, Health and Human Rights Development Centre (LHAHRDEV)
   Nigeria
86. Land Workers’ Alliance
   UK
87. Local Futures
   International
88. Mangrove Action Project
   International
89. Maryknoll Office for Global Concerns
   USA
90. Movement Rights
   USA
91. Namati
   USA
92. National Family Farm Coalition
   USA
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<tr>
<th></th>
<th>Organization Name</th>
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<td>93.</td>
<td>Nesara Farmers’ Market</td>
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<td>Network for Vital Agriculture and Nutrition</td>
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<td>Nicaragua Center for Community Action (NICCA)</td>
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<td>96.</td>
<td>Nothing But Tea</td>
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<td>97.</td>
<td>NOUS SOMMES LA SOLUTION</td>
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<td>Nyambya Tea Co</td>
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<td>Oakland Institute</td>
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<td>100.</td>
<td>Open Food Network</td>
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<td>OT Watch</td>
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<td>102.</td>
<td>Other Worlds</td>
<td>USA</td>
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<td>103.</td>
<td>Pacific Network on Globalisation (PANG)</td>
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<td>Partners for the Land &amp; Agricultural Needs of Traditional Peoples (PLANT)</td>
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<td>Platform Aarde Boer Consument</td>
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<td>Popular Resistance</td>
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<td>Rashtriya Raithu Seva Samithi</td>
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<td>Red de Organizaciones Sociales de Managua</td>
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<td>Red por una América Latina Libre de Transgénicos (RALLT)</td>
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<td>Réseau de Lutte contre la Faim (RELUFA)</td>
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<td>135.</td>
<td>Tropical Agriculture Association</td>
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<td>Trust for Community Outreach and Education (TCOE)</td>
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<td>137.</td>
<td>Union Paysanne</td>
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<td>138.</td>
<td>United Nations Association, UK Branch (UNA-UK)</td>
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<td>139.</td>
<td>United Small and Medium scale Farmers’ Associations of Nigeria (USMEFAN)</td>
<td>Nigeria</td>
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<td>Urgewald</td>
<td>Germany</td>
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141. Walking on the South (WotS)  
142. Women’s International League for Peace and Freedom (WILPF)  
143. World Family  
144. Zambia Alliance for Agroecology and Biodiversity Conservation (ZAABC)  
145. Zestful Development Services (ZDES)  
146. Dr. Norman Uphoff – Professor Emeritus of Government and International Agriculture and Core Faculty Member, Cornell Institute for Public Affairs, Cornell University, USA  
147. Dr. Michel Pimbert – Professor and Executive Director of the Centre for Agroecology, Water and Resilience, Coventry University, UK  
148. Dr. David J. Midmore – Emeritus Professor, Central Queensland University, Australia  
149. Dr. Peter Dart – Honorary Associate Professor, School of Agriculture and Food Science, University of Queensland, Australia  
150. Dr. Amir Kassam – OBE, FRSB, Visiting Professor, School of Agriculture, Policy and Development, University of Reading, UK  
151. Dr. Peter Greaves – Former Senior Adviser at UNICEF’s Programme Division (micronutrients) and Former Secretary of the British Nutrition Foundation, UK  
152. Dr. Michael Spann – School of Political Science and International Studies, University of Queensland, Australia  
153. Dr. Molly D. Anderson – William R. Kenan Jr. Professor of Food Studies, Middlebury College, USA  
154. Dr. Tushar Chakraborty – Head, Gene Regulation Laboratory, Indian Institute of Chemical Biology, India  
155. Dr. Willem A. Stoop – Agronomist, Former Researcher at CIMMYT, ICRISAT, ISNAR and WARDA and Royal Tropical Institute in Amsterdam, The Netherlands  
156. Dr. Anne Woodfine – Tropical Natural Resources and Sustainable Land Management Specialist  
157. Devon Jenkins – Program Specialist, International Programs, College of Agriculture and Life Sciences, Cornell University, USA

Sent via email:
Jim Yong Kim, President of the World Bank Group

Cc:
Bill Gates, Co-Chair of the Bill & Melinda Gates Foundation  
Gayle Smith, Administrator of the United States Agency for International Development  
Kristian Jensen, Minister for Foreign Affairs, Denmark  
Priti Patel, Secretary of State for International Development, United Kingdom  
Lilianne Ploumen, Minister for Foreign Trade and Development Cooperation, The Netherlands  
Federica Saliola, Program Manager in the WBG Development Economics Vice-Presidency

Research has shown that widely used arguments to discredit farmers’ seeds as potentially unsafe and prone to diseases are unfounded. Studies find no significant differences between quality of farmer seeds and industrial seeds (in terms of health, absence of contaminants, etc.), and no evidence exists that seed recycling (saving the seeds for sowing at the next crop season) lowers quality. See: Coomes, Oliver T. et al. “Farmer seed networks make a limited contribution to agriculture? Four common misconceptions.” Food Policy 56 (2015): 41-50.


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